

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**  
Alexandria Division

<b>UNITED STATES OF AMERICA,</b>	:	
	:	
v.	:	<b>Case No. 1:18-CR-457 (AJT)</b>
	:	
<b>BIJAN RAFIEKIAN</b>	:	
	:	
<b>and</b>	:	
	:	
<b>KAMIL EKIM ALPTEKIN,</b>	:	
	:	
<b>Defendants.</b>	:	

**DEFENDANT’S MOTION FOR A BILL OF PARTICULARS**

Defendant, through counsel, respectfully moves the court for an order directing the government to provide defendant with a bill of particulars as requested in his accompanying memorandum of law. Specifically, the bill of particulars should contain the following information:

- (1) In Paragraph 53 of the Indictment, what, if any, false statements did Mr. Rafiekian make to Company A attorneys other than those already alleged in the Indictment?
- (2) In Paragraph 56, what information in the response to Paragraph 7 of the FARA registration was false and in what way was the information false?;
- (3) In Paragraph 57, what information in the response to Paragraph 8 of the FARA registration was false and in what way was the information false?;
- (4) In Paragraph 58, what information in Exhibit A to the FARA Registration was false, and in what way was the statement as described in Paragraph 58 false?;

(5) In Paragraph 59, what information in Paragraph 8(b) of Exhibit A to the FARA Registration was false, and in what way was the statement as described in Paragraph 59 false?;

(6) In Paragraph 60, what information in Paragraph 8(b) of Exhibit A to the FARA Registration was false, and in what way was the statement as described in Paragraph 60 false?;

(7) What material facts did Mr. Rafiekian conspire to omit as alleged in Paragraph 2(b) of Count One?;

(8) What material document or copy thereof did Mr. Rafiekian conspire to omit, as alleged in Paragraph 2(b) of Count One?;

(9) Who are the known co-conspirators of Mr. Rafiekian and Mr. Alptekin, as alleged in Count One?;

(10) In Counts One and Two, who were the others whom Mr. Rafiekian knowingly and intentionally conspired to and knowingly did cause to act as an agent of a foreign government without prior notice to the Attorney General?

To the extent that certain allegations in the Indictment are not susceptible to this motion as addressed in the accompanying memorandum of law, we respectfully request that the Court strike those allegations under Fed. R. Crim. P. 7(d) as prejudicial surplusage. The grounds for this motion are set forth in the accompanying memorandum of law.

Defendant respectfully requests that the Court hear this motion at the hearing set for February 4, 2019.

Respectfully submitted,

/s/ Mark J. MacDougall

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**CERTIFICATE OF SERVICE**

I hereby certify that, on this 18 day of January, 2019, I caused a true and correct copy of Defendant's Motion for A Bill of Particulars and Proposed Order to be served via electronic mail by the Court's CM/ECF system on counsel for all codefendants and on the following:

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/s/ Robert P. Trout  
Robert P. Trout (VA Bar # 13642)

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<b>KAMIL EKIM ALPTEKIN,</b>	:	
	:	
<b>Defendants.</b>	:	

**[PROPOSED] ORDER**

Upon consideration of Defendant's Motion for a Bill of Particulars, memorandum in support thereof, any opposition thereto, any reply in further support thereof, and the entire record herein, for good cause shown, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2019, hereby

**ORDERED** that the Motion is **GRANTED**; and it is further

**ORDERED** that the Government shall provide Defendant with the particulars requested in his motion.

**SO ORDERED.**

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The Honorable Anthony Trenga  
United States District Judge